

Jermain, Dunnagan & Owens
Billing Detail for
Trowel Trades Trusts

Matter # 00161¹

DATE	ID	FOR PROFESSIONAL SERVICES RENDERED	HRS	RATE	AMOUNT
08/10/2005	HRK	Prepare application, affidavit and entry of default; file research to determine when complaint was served on defendant, forward draft to Attorney Josephson	1.70	110.00	\$187.00
08/12/2005	SEJ	Review Application for Entry of Default, Affidavit for Entry of Default and Entry of Default; Provide instruction re: confirming no answer was filed and then finalizing and filing same.	0.30	160.00	\$48.00
08/17/2005	SEJ	Finalize application for entry of default, entry of default, and affidavit in support; Provide instruction re: filing and service of same	0.20	160.00	\$32.00
08/18/2005	SEJ	Review answer to complaint from General Concrete; Provide instruction re: faxing same to Tana for her files.	0.20	160.00	\$32.00
08/22/2005	SEJ	Receipt and review of court order re: General Concrete hiring counsel.	0.10	160.00	\$16.00
09/20/2005	DTA	Update calculations for status report.	0.30	110.00	\$33.00
09/21/2005	DTA	Review letter from Michael Gallagher.	0.10	110.00	\$11.00
09/25/2005	SEJ	Draft e-mail to staff providing instruction to check the court file during the coming week to see if employer has retained counsel who has filed an answer; Provide instruction re: moving for default if no answer has been filed.	0.10	160.00	\$16.00
09/27/2005	SEJ	Receipt of message re: courier's review of court file; Provide instruction re: moving for entry of default.	0.10	160.00	\$16.00
09/28/2005	SEJ	Finalize application for entry of default, affidavit, and entry of default based on requirements of Local Rule 83.1 requiring corporations to be represented by counsel; Provide instruction re: filing of same.	0.40	160.00	\$64.00
09/30/2005	DTA	Review email from Tana re: amounts owed to Trowel Trades; review payment spreadsheets	0.50	110.00	\$55.00
10/06/2005	DTA	Review email from Tana.	0.10	110.00	\$11.00
10/30/2005	SEJ	Receipt and review of fax from General Concrete; Provide instruction re: calendaring additional time for them to answer	0.10	160.00	\$16.00
11/14/2005	SEJ	Receipt of message from Lawrence Belarde re: status of offer; Provide instruction to inform him settlement offer has been forwarded to client for review, but that his answer is due in court tomorrow unless he seeks further time; Receipt and review of fax re: same.	0.30	160.00	\$48.00
12/26/2005	SEJ	Review file; Draft fax memo to General Concrete rejecting settlement offer and addressing status of litigation; Provide instruction re: same.	0.40	160.00	\$64.00
12/27/2005	SEJ	Provide instruction re: finalizing memo to General Concrete as to settlement and attaching court's order.	0.10	160.00	\$16.00
12/15/2005	DTA	Conference w/SEJ and Tana Hart	0.10	110.00	\$11.00
01/04/2006	DTA	Collection status conference w/SEJ	0.10	110.00	\$11.00
01/11/2006	SEJ	Telephone from bar association; Inform Randy re: same; Telephone	0.40	160.00	\$64.00

¹ There are two matters referenced for General Concrete (39000.112 and 39000.161). The original matter opened in 1996 was for collection of unpaid contributions is #39000.112. That matter number was used until 2005 when a new file was opened for collection of additional unpaid contributions by General Concrete, file #39000.161.

DATE	ID	FOR PROFESSIONAL SERVICES RENDERED	HRS	RATE	AMOUNT
		Tana re: same [left message].			
01/12/2006	SEJ	Draft e-mail to bar association re: Belarde complaint; Receipt of e-mail from bar counsel re: same.	0.20	160.00	\$32.00
01/26/2006	SEJ	Receipt and review of letter from Bar Association dismissing Belarde's complaint; Draft e-mail to Randy re: same.	0.10	160.00	\$16.00
01/29/2006	SEJ	Draft e-mail to paralegal re: conferring with Tom to make certain we have documentation as to all amounts owing; Analysis of amending complaint re: same.	0.20	160.00	\$32.00
01/31/2006	SEJ	Telephone from Bar Association re: Belarde's request for reconsideration; Review file re: same.	0.40	160.00	\$64.00
02/02/2006	SEJ	Review letter from Lawrence Belarde requesting reconsideration of bar complaint; Receipt and review of letter from Steve Van Goor addressing same.	0.20	160.00	\$32.00
03/09/2006	DTA	Conference w/SEJ	0.10	110.00	\$11.00
03/13/2006	SEJ	Receipt of email from federal court regarding granting entry of default; draft email to staff re same	0.10	110.00	\$11.00
03/14/2006	SEJ	provide instruction re re-submitting motion for default judgment and beginning work on attorney fees motion and cost bill	0.20	160.00	\$32.00
03/14/2006	LDL	Review file re motion for attorney fees	1.30	150.00	\$195.00
03/16/2006	SEJ	Analysis of status with Randy	0.20	160.00	\$32.00
03/21/2006	LDL	Draft motion for entry of default judgment	2.00	150.00	\$300.00
03/27/2006	SEJ	Begin dictation of Motion, Memorandum, Affidavit, and Order for Attorney Fees; Provide instruction re attaching and labeling exhibits for same	1.30	160.00	\$208.00
03/28/2006	SEJ	Telephone with Tom and Tana; Review amounts owing; Provide instruction re follow-up	1.80	160.00	\$288.00
03/28/2006	DTA	Conferences w/SEJ; review file to determine contributions owed; begin preparing default judgment; calls to/from Tana Hart; call/email to Tom Frohlich	3.50	110.00	\$385.00
03/29/2006	DTA	Review email from Tom Frohlich; call to Tom; create spreadsheet of contributions/ld/interest owing for default judgment; email to Tana Hart	1.6	110.00	\$176.00
03/29/2006	JWR	Discussed with Sarah; reviewed email, file; researched federal rules and cases on continuing service for default judgments and motions for attorney fees; drafted memo; discussed with Sarah	1.8	85.00	\$153.00
03/31/2006	DTA	Revise default judgment	0.20	110.00	\$22.00
04/04/2006	DTA	Calls from Tana Hart; revise spreadsheet	0.60	110.00	\$66.00
04/05/2006	SEJ	Analysis of including additional amounts owing in default	0.20	160.00	\$32.00
04/05/2006	DTA	Conference w/SEJ	0.20	110.00	\$22.00
04/06/2006	DTA	Revise spreadsheet	0.20	110.00	\$22.00
04/11/2006	DTA	Discuss default judgment w/SEJ	0.20	110.00	\$22.00
04/12/2006	SEJ	Continued work on finalizing Motion, Memorandum and Affidavits for Default Judgment	2.50	160.00	\$400.00
04/18/06	SEJ	Telephone Tana re exhibits to attach to default judgment (left message); continued review and revisions to same	0.50	160.00	\$80.00
04/18/2006	DTA	Review default packet w/SEJ	0.20	110.00	\$22.00
04/19/2006	SEJ	Receipt and review of pleading from the court re default; provide instruction re follow-up on same	0.10	160.00	\$16.00
04/22/2006	SEJ	Telephone Tom re obtaining copy of signed compliance agreement or CBA to attach as an exhibit (left message)	0.10	160.00	\$16.00
04/24/2006	SEJ	Receipt of fax from Tom with Compliance Agreement; provide instruction to staff re finalizing pleadings for same	0.10	160.00	\$16.00
04/26/2006	DTA	Update interest calculations; begin revising application for entry of			

DATE	ID	FOR PROFESSIONAL SERVICES RENDERED	HRS	RATE	AMOUNT
		default judgment	0.70	110.00	\$77.00
04/27/2006	SEJ	Finalize motion for default judgment	0.60	160.00	\$96.00
04/27/2006	DTA	Calls to/from Tana Hart; revise spreadsheet of current Id's and interest; revise motion for entry of default judgment; conference w/SEJ	2.60	110.00	\$286.00
04/28/2006	DTA	Complete revisions to motion for entry of default judgment, Tana Hart and Tom Frohlich affidavits; email to Tana Hart	1.30	110.00	\$143.00

Subtotal of Paralegals hours 14.3

Subtotal of Lawclerk hours 1.8

Subtotal of Attorney hours 14.8

Total Hours 30.9

Jermain, Dunnagan & Owens
Billing Detail for
Trowel Trades Trusts

Matter # 00112²

DATE	ID	FOR PROFESSIONAL SERVICES RENDERED	HRS	RATE	AMOUNT
06/24/2004	SEJ	Telephone with opposing counsel re: setting up a meeting ³ ; Draft note to file; Draft e-mail to Jennifer re: setting up a meeting ⁴	0.30	150.00	\$45.00
06/30/2004	SEJ	Continued work on arranging meeting; Receipt of message from General Concrete's counsel; Telephone General Concrete's counsel [left message]; Telephone with General Concrete's counsel; Telephone with Tom re: status ⁵ ; Draft memo to file; Telephone with Jennifer re: same.	0.90	150.00	\$135.00
07/02/2004	SEJ	Telephone with Eric LeRoy re: status	0.10	150.00	\$15.00
07/06/2004	SEJ	Analysis of status with Randy; Telephone Jennifer re: setting up a meeting; Receipt of message from Jennifer re: whether we had received a written proposal; Telephone Eric LeRoy, General Concrete's counsel requesting same; Telephone with Jennifer re: meeting; Receipt and review of fax from Tom.	0.70	150.00	\$105.00
07/07/2004	SEJ	Telephone with Tom Frohlich re: meeting and audit; Draft memo to file re: same; Telephone Eric LeRoy re: status; Telephone from Jennifer re: setting up meeting; Draft e-mail to Randy re: same; Telephone with Jennifer re: July 15 meeting; Draft e-mail to Tom and Jennifer re: setting meeting; Receipt and review of proposed plan from General Concrete's counsel; Receipt of message from opposing counsel; Telephone opposing counsel re: meeting.	1.10	150.00	\$165.00
07/14/2004	SEJ	Telephone to Tom Frohlich re: setting up a meeting as to audit; Telephone with Eric LeRoy re: same; Receipt of call from Tom re: meeting;	0.40	150.00	\$60.00
07/26/2004	SEJ	Receipt of message from Eric LeRoy; Telephone with Eric LeRoy re: scheduling a meeting; Draft memo to file re: same; Provide instruction to staff re: drafting a letter confirming okay to talk with Angel and attend meeting without attorney being present; Begin review and edit of letter re: same.	0.40	150.00	\$60.00
07/29/2004	SEJ	Review of fax from Angel re: her view of status of matter; Provide instruction re: setting up a meeting; Telephone Mike Brady re: status; Dictate memo re: same; Telephone from Jennifer with Angel re: audit x2; Telephone from Jennifer re: status of case, discussions with Gallagher, etc.; Dictate memos to file re: same; Draft e-mail to Tom re: other avenues to pursue; Receipt and review of e-mail from Jennifer	1.10	150.00	\$165.00
08/04/2004	LSS	Conference with Sarah re: Confession of Judgment and mtg on 8/5	0.20	95.00	\$19.00
08/04/2004	LSS	Draft Confession of Judgment.	0.60	95.00	\$57.00
08/04/2004	SEJ	Begin review of new confession.	0.20	150.00	\$30.00

² There are two matters referenced for General Concrete (39000.112 and 39000.161). The original matter opened in 1996 was for collection of unpaid contributions is #39000.112. That matter number was used until 2005 when a new file was opened for collection of additional unpaid contributions by General Concrete, file #39000.161.

³ Opposing counsel for General Concrete at one time was Eric LeRoy.

⁴ Jennifer Stout was Collections Coordinator for Alaska Laborers-Employers Trust Funds; Jennifer Stout was replaced by Tana Hart, the current Collections Coordinator for Alaska Laborers-Employers Trust Funds.

⁵ Tom Frohlich is Business Manager for the Plasterers and Cement Masons ("the Trowel Trades").

DATE	ID	FOR PROFESSIONAL SERVICES RENDERED	HRS	RATE	AMOUNT
08/27/2004	SEJ	Preparation for and attendance at conference with General Concrete and its counsel.	1.80	150.00	\$270.00
09/08/2004	SEJ	Telephone with Eric LeRoy re: client's accepting proposal as long as full payment of \$2,500/\$2,500/\$10,000.00 are made and a Confession is signed; telephone Jennifer with status [left message].	0.20	150.00	\$30.00
09/10/2004	SEJ	Provide instruction re: following up with opposing counsel as to obtaining payment and signed agreement.	0.10	150.00	\$15.00
09/16/2004	SEJ	Telephone to Eric Leroy re: status of obtaining signed confession; Telephone Tom re: same.	0.40	150.00	\$60.00
09/17/2004	COT	Draft and review Confession of Judgment; Settlement Agreement and Agreement not to Execute.	2.00	150.00	\$300.00
09/24/2004	COT	Client phone conversation; review documents from file; draft confession of judgment and return client phone call.	1.00	150.00	\$150.00
09/25/2004	COT	Review confession of judgment.	0.50	150.00	\$75.00
09/27/2004	SEJ	Telephone from Tom re: status of obtaining signed Confessions for audit amounts and wages and his discussions with General Concrete; Follow-up re: same.	0.20	150.00	\$30.00
09/28/2004	SEJ	Review status of draft confession; Provide instruction re: finalizing confession and additional information required.	0.10	150.00	\$15.00
09/29/2004	LSS	Work on Confession of Judgment.	0.40	95.00	\$38.00
09/30/2004	LSS	Conference with Sarah re: amounts covered by Confession of Judgment	0.20	95.00	\$19.00
09/30/2004	LSS	Revise Confession of Judgment and Settlement Agreement; telephone conference with Jennifer	0.40	95.00	\$38.00
09/30/2004	SEJ	Provide instruction re: Confession of Judgment and drafting memo re: status of total contributions, interest, and liquidated damages owed; Review and revise same; Receipt of message from Jennifer; Review of memo re: status of account; Telephone with Jennifer re: calculations; Receipt of e-mail from Jennifer with calculations.	0.80	150.00	\$120.00
10/01/2004	RGS	Preparation and conf. w/S. Sims re: payment of contributions and wages; review provisions of confession of judgment; instruct staff.	1.20	175.00	\$210.00
10/02/2004	SEJ	File status review from Sherry re: obtaining payment and signed confessions.	0.10	150.00	\$15.00
10/11/2004	LSS	Review Confession of Judgment.	0.20	95.00	\$19.00
10/12/2004	SEJ	Review and revise settlement agreement	0.20	150.00	\$30.00
10/13/2004	LSS	Review file for start of audit period; email to Teresa for fees incurred from December 2003 to present.	0.30	95.00	\$28.50
10/13/2004	LSS	Conference with Sarah re: status of current Confessions of Judgment and payment expected.	0.20	95.00	\$19.00
10/13/2004	SEJ	File status review and update re: finalizing and obtaining signed agreements.	0.20	150.00	\$30.00
10/15/2004	LSS	Conference with Sarah and email to Jennifer re: fees.	0.10	95.00	\$9.50
10/15/2004	LSS	Revise Confession of Judgment with new attorney fees number.	0.10	95.00	\$9.50
10/28/2004	COT	Draft revised confession of judgment; settlement agreement.	1.50	150.00	\$225.00
10/28/2004	COT	Meet with SEJ to discuss settlement agreement.	0.40	150.00	\$60.00
10/28/2004	SEJ	Continued revisions to settlement agreement and confession.	0.20	150.00	\$30.00
10/29/2004	SEJ	File status review and update re: finalizing confession.	0.10	150.00	\$15.00
11/05/2004	SEJ	Review and revise letter to Eric LeRoy re: whether he is still representing General Concrete.	0.20	150.00	\$30.00
11/08/2004	COT	Draft email to Jennifer re: status of settlement.	0.20	150.00	\$30.00
11/15/2004	COT	Status report; email Jennifer draft confessions; phone conversation with Tom.	0.80	150.00	\$120.00
11/17/2004	COT	Meet with SEJ; confirm amounts paid; conversation with Mike re: co	0.30	150.00	\$45.00

DATE	ID	FOR PROFESSIONAL SERVICES RENDERED	HRS	RATE	AMOUNT
		confession of judgment			
11/18/2004	COT	Discuss confessions of judgment with SEJ (n/c)	0.20	0.00	\$0.00
11/18/2004	SEJ	Edit and finalize Confession.	0.30	150.00	\$45.00
11/30/2004	SEJ	Provide instruction re: contacting Lawrence and Angel as to status of obtaining confession.	0.10	150.00	\$15.00
12/02/2004	COT	Draft letter to General Concrete re: confession of judgments.	0.20	150.00	\$30.00
12/03/2004	SEJ	Receipt of message from General Concrete re: confession. No charge.	0.10	0.00	\$0.00
12/15/2004	SEJ	Receipt of message from Lawrence at General Concrete; Provide instruction re: follow-up of same; Review status of obtaining signed confession of judgment and settlement agreement.	0.20	150.00	\$30.00
12/17/2004	COT	Phone conversation with Gen. Concrete re: settlement agreement	0.10	150.00	\$15.00
12/17/2004	SEJ	File status review and update re: communications with employer and getting signed confession.	0.10	150.00	\$15.00
12/20/2004	COT	Phone conversation with General Concrete re: settlement agreement.	0.10	150.00	\$15.00
01/12/2005	SEJ	File status review and update re: discussions with employer and getting confession and settlement agreement signed.	0.20	150.00	\$30.00
01/31/2005	COT	Phone conversations with General Concrete re: confession of judgment; review attorney fees.	0.20	160.00	\$32.00
02/01/2005	COT	Phone conversation with Osowski. ⁶	0.30	160.00	\$48.00
02/02/2005	COT	Note to file; message with opposing attorney re: terms of counteroffer.	0.10	160.00	\$16.00
02/03/2005	COT	Phone conversation with Tom Frohlich re: fax from LB.	0.20	160.00	\$32.00
02/11/2005	COT	Draft letter to General Concrete.	0.30	160.00	\$48.00
02/23/2005	COT	Follow-up letter to Osowski re: settlement.	0.10	160.00	\$16.00
05/03/2005	SEJ	Receipt of message from Tom re: General Concrete's questions as to audit costs; Provide instruction re: contacting Lockitch Clements and Rice re: same. ⁷	0.20	160.00	\$32.00
05/05/2005	LSS	Review file for status and amounts owed.	0.20	110.00	\$22.00
05/05/2005	SEJ	Receipt and review of e-mail from paralegal re: status of file; Provide instruction re: same.	0.10	160.00	\$16.00
05/09/2005	SEJ	Telephone from Tom re: cost of the audit; Provide instruction re: follow-up re: same.	0.20	160.00	\$32.00
06/05/2005	SEJ	File status review and update re: drafting suit for more recent amounts owing and executing on judgment.	0.20	160.00	\$32.00
06/07/2005	SEJ	File status review re: filing complaint in federal court for more recent amounts owing.	0.10	160.00	\$16.00
06/13/2005	SEJ	Provide instruction re: complaint.	0.10	160.00	\$16.00
06/15/2005	SEJ	Finalize complaint; Provide instruction re: summons and service re: same.	0.50	160.00	\$80.00
07/07/2005	SEJ	Receipt and review of e-mail from staff re: status of service.	0.10	160.00	\$16.00
07/26/2005	SEJ	Draft e-mail to staff re: status of service of complaint; Receipt of status of service; Provide instruction re: calendaring due date for answer or moving for entry of default.	0.20	160.00	\$32.00
08/09/2005	SEJ	Provide instruction re: seeking entry of default if answer is not received on Thursday the 11th.	0.20	160.00	\$32.00
09/20/2005	SEJ	Continued review and revisions to status report; Draft e-mail to paralegal re: same; Forward report to Tana for her consideration.	0.30	160.00	\$48.00
10/03/2005	SEJ	Receipt and review of Clerk's Notice re: status of obtaining default; Receipt and review of Amended Minute Order giving additional	0.20	160.00	\$32.00

⁶ Shane Osowski was representing General Concrete for a period of time.

⁷ Lockitch, Clements & Rice is the firm that conducted the audit.

		time to General Concrete to obtain counsel; Provide instruction re: calendaring same.			
10/28/05	SEJ	Receipt and review of fax from General Concrete; provide instruction re follow-up on same	0.20	160.00	\$32.00
11/12/2005	SEJ	Receipt and review of fax from General Concrete; Draft e-mail to staff providing instruction to forward same to client; Draft e-mail to Tom and Tana re: same.	0.40	160.00	\$64.00
11/15/2005	SEJ	Provide instruction re: contacting General Concrete about their answer.	0.10	160.00	\$16.00
12/15/2005	SEJ	Confer with Tana re: status.	0.10	160.00	\$16.00
12/18/2005	SEJ	Telephone Tom Frohlich re: status of settlement proposal [left message].	0.10	160.00	\$16.00
12/19/2005	SEJ	Telephone from Tom returning my call re: General Concrete's offer; Draft note to file re: same.	0.30	160.00	\$48.00
12/29/2005	SEJ	Analysis of next step in litigation to obtain judgment when General Concrete has answered, but court insisted they find counsel; Review federal rules re: same; Provide instruction re: contacting court re: same; Receipt of information from court; Begin revisions to motion for entry of default judgment; Review and revise application for entry of default.	0.70	160.00	\$112.00
01/01/2006	SEJ	Continued review and revisions of affidavit in support of entry of default, entry of default, and application for same.	0.30	160.00	\$48.00
01/04/2006	SEJ	File status review and update re: litigation; Continued work on finalizing affidavit in support of entry of default; Provide instruction re: finalizing and filing with court.	0.30	160.00	\$48.00
01/25/2006	SEJ	Receipt and review of e-mail from federal court re: reassignment of the General Concrete case.	0.10	160.00	\$16.00
02/02/2006	SEJ	Review letter from Lawrence Belarde requesting reconsideration of bar complaint; receipt and review of letter from Steve Van Goor addressing same	0.20	160.00	\$32.00
03/30/2006	SEJ	Continued work on finalizing default judgment and motion for fees; review memo of service re same; review email from paralegal re status of file and accounting	0.40	160.00	\$64.00

Subtotal of Paralegals hours 3.0

Subtotal of Attorney hours 25.1

Total Hours 28.1